

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE MATTER OF THE *EX PARTE*
APPLICATION OF B&C KB HOLDING
GMBH FOR AN ORDER TO TAKE
DISCOVERY PURSUANT TO 28 U.S.C.
§ 1782 FROM GOLDBERG LINDSAY &
CO. LLC D/B/A LINDSAY GOLDBERG
AND MICHAEL DEES

Case No. 22-mc-180

**NOTICE OF THE *EX PARTE* APPLICATION OF B&C KB HOLDING GMBH
FOR AN ORDER TO TAKE DISCOVERY
PURSUANT TO 28 U.S.C. § 1782**

PLEASE TAKE NOTICE that B&C KB Holding GmbH, upon the accompanying Application, Memorandum of Law, Declaration of Dr. Michael Rohregger, Declaration of Thomas Zimpfer, Declaration of Dr. Jakob Danckert, Declaration of Zachary D. Rosenbaum, all exhibits attached thereto, and all other evidence the Court deems appropriate, petitions this Court, pursuant to 28 U.S.C. § 1782, for an order granting this Application to serve subpoenas on respondents Goldberg Lindsay & Co. LLC and Michael Dees.

Dated: July 14, 2022
New York, New York

Respectfully submitted,

s/ Zachary D. Rosenbaum
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